

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,	:	Case No. 1:15CR116(12)
	:	
Plaintiff,	:	(Judge Black)
	:	
vs.	:	
	:	
ASHLEY WILSON,	:	<b><u>DEFENDANT, ASHLEY WILSON'S,</u></b>
	:	<b><u>MOTION TO MODIFY BOND</u></b>
	:	<b><u>CONDITIONS</u></b>
Defendant.	:	

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Now comes Ashley Wilson, through counsel, and she respectfully moves the Court to modify her bond condition forbidding her from having contact with her mother, Stacey Howell, who is a co-defendant housed in the Butler County Jail. She is also requesting that the no-contact order be lifted as to co-defendant, Kyle Steger, who is free on bail and is the father of their 2-year old child.

Ms. Wilson would like to be able to communicate by phone or in person with her mother, Stacey Howell, and with her child's father, Kyle Steger, as to matters regarding their 2-year old child in her custody. There have been no problems or issues with Pre-Trial Supervision since Ms. Wilson's release from custody on November 10, 2015. Pre-Trial Officer, Katrina Tibbs, advised counsel that she has no objection to this modification of bond.

It is, therefore, respectfully requested that the no-contact order be lifted as to Stacey Howell and Kyle Steger.

/s/ Richard J. Goldberg  
Richard J. Goldberg (0005979)  
Attorney for Ashley Wilson  
Schuh & Goldberg, LLP  
2662 Madison Road  
Cincinnati, Ohio 45208  
(513) 321-2662  
(513) 321-0855 (Fax)  
richjgoldberg@yahoo.com

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing Motion upon the office of the United States Attorney for the Southern District of Ohio, via electronic filing, this 1<sup>st</sup> day of March, 2016.

/s/ Richard J. Goldberg  
Richard J. Goldberg  
Attorney for Ashley Wilson